

type double patenting. The Applicants respectfully traverse these rejections as follows.

Claim 1 defines a system for establishing a communication pipe between a personal security device (PSD) and a remote computer system over a network having a local client that acts as a host for the PSD. The local client connects to the PSD and network and: (1) separates encapsulated APDUs from message packets that are received from the remote computer system and communicates the separated APDUs to the PSD, and (2) encapsulates APDUs received from the PSD into message packets that are communicated to the remote computer system.

The Office Action proposes that DiGiorgio discloses a system in which a secure token device and a local computer communicate via a token reader (see Office Action section 5, lines 3-4). The Office Action further proposes that DiGiorgio's token reader corresponds to the claimed local client (see section 5, lines 5-9). However, the Office Action acknowledges that DiGiorgio's token reader does not perform the claimed features (1) and (2) identified above (see page 3, last two lines).

To overcome this deficiency, the Office Action proposes that Coulier discloses protocols for microcomputer peripherals that encapsulate/de-encapsulate APDUs transmitted to/from a smart card (see page 4, lines 1-2).

Based on Coulier's teachings, the Office Action proposes that a skilled artisan would have found motivation to modify DiGiorgio's secure token device to encapsulate, within data packets, the APDUs transmitted by the secure token device to the local computer and de-encapsulate, from received data packets, the APDUs transmitted to the secure token device by the local computer (see page 4, lines 2-5). According to the Office Action, the motivation to make the modification would have been to eliminate DiGiorgio's smart card reader (i.e., secure token device reader) (see page 4, lines 2-4).

Thus, the modified system proposed by the Office Action would consist of a secure token device that communicates directly with a computer, without an intermediary secure token device reader. Because the Office Action proposes: (1) that DiGiorgio's token reader corresponds to the claimed local client and (2) the combined teachings of DiGiorgio and Coulier suggest eliminating the token reader, it necessarily follows that the combined teachings of DiGiorgio and Coulier cannot suggest the claimed combination, which relies on a local client to interface a PSD and a remote computer.

More specifically, the combined teachings of DiGiorgio and Coulier do not teach or suggest the claimed subject matter of a local client connected to a PSD and a remote computer, via a

network, that: (1) separates encapsulated APDUs from message packets that are received from the remote computer system and communicates the separated APDUs to the PSD and (2) encapsulates APDUs received from the PSD into message packets that are communicated to the remote computer system.

Accordingly, the Applicants respectfully submit that DiGiorgio and Coulier, considered individually or in combination, do not render obvious the subject matter defined by claim 1. Independent claims 20, 29, and 42 similarly recite the above-described features distinguishing apparatus claim 1 from DiGiorgio and Coulier, but with respect to methods. Therefore, the obviousness rejections applied to claims 18 and 40 are considered to be obviated, and allowance of claims 1, 20, 29, and 42, and all claims dependent therefrom, is deemed to be warranted.

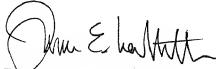
All double patenting rejections have been made provisional; the Applicants will address the double patenting rejections when the provisional status thereof is removed.

In view of the above, it is submitted that this application is in condition for allowance and a notice to that effect is respectfully solicited.

If any issues remain which may best be resolved through a telephone communication, the Examiner is requested to telephone

the undersigned at the local Washington, D.C. telephone number listed below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James E. Ledbetter". The signature is fluid and cursive, with a large initial "J" and "L".

James E. Ledbetter  
Registration No. 28,732

Date: October 22, 2007  
JEL/DWW/att

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